

EXHIBIT 5

Transcript of the Testimony of
William H. Clark

November 28, 2022

Jennifer Virden v. City of Austin

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1 WILLIAM H. CLARK,
2 having been first duly sworn, testified as follows:
3 EXAMINATION
4 BY MR. HICKS:
5 Q Mr. Clark, what did you do in preparation for
6 today's deposition?
7 A Not much. Spoke briefly with Jerad
8 downstairs, and we had a little phone conversation, I
9 don't know how long, maybe 15, 20 minutes or so on the
10 phone on the drive here. And email, sent me an email a
11 few weeks ago where you had some interrogatories you
12 wanted answers to. So I answered those, and I
13 re-reviewed the documents. I believe it was this
14 document. Whatever, whatever this --
15 Q Right.
16 A My statements, previous statements. That's
17 it, so not much.
18 Q Okay. What does the H stand for?
19 A Hudson.
20 Q Okay.
21 A William Hudson Clark.
22 Q Let's look at Deposition Exhibit 1.
23 A Mm-hm.
24 Q Ask you to take a look at that. Does that
25 appear to be the Notice of Deposition that you're

Page 5

1 appearing here for?
2 A I've never seen this document before, but --
3 I mean, I've never seen this before, but it would
4 appear to be correct.
5 Q Okay. As I understand it, you now reside in
6 Spring, Texas at 28122 East Benders Landing; is that
7 correct?
8 A That is correct.
9 (Exhibit No. 2 marked.)
10 Q I'd ask you to take -- go ahead if you need
11 to look at that.
12 A Look at this now?
13 Q Take a look at Exhibit 2 that's in front of
14 you. I'll represent to you that these are -- you
15 probably recognize them -- your responses to the city's
16 first set of interrogatories. Do you recognize those?
17 A I've never seen this, never seen this before,
18 but so this whole document or just the first page?
19 Q The whole document. These are your answers.
20 A Okay. Yeah. All right. We'll see. Yes.
21 This just gives my current and former residences on
22 number 1. Yeah. So this is just me describing my
23 duties as a volunteer coordinator back on the city
24 council campaign in 2020. Identifying campaign
25 contributions to Jennifer Virden's campaigns. This

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1 looks right. Yeah. Okay. Sure.
2 Q Okay. Do you, do you have anything that
3 you've seen in this Exhibit 2 in your responses that
4 you want to correct or change?
5 A No. Not that I'm aware of.
6 Q Do you have anything to supplement other
7 than -- well, do you have anything to supplement?
8 A I can reread it again to make sure if you
9 want.
10 Q We'll go through it in greater detail if you
11 want, but you're welcome to read through it as much as
12 you want to right now.
13 A Yeah. I mean, this is fine.
14 Q Okay. Where is Spring, Texas?
15 A It is east of The Woodlands. So The
16 Woodlands is actually a community inside of Spring.
17 It's Montgomery County, Texas, so it's north of Houston
18 in Montgomery County, which is adjacent to Harris
19 County. And Spring actually encompasses parts of
20 Harris County and, and Montgomery County.
21 Q And about how far is it where you live from
22 Austin roughly?
23 A It's about two, two and a half hours, a
24 little over two and a half hours.
25 Q Okay. In the period between November 1, 1997

Page 7

1 and October of 2014 where did you live?
2 A From '97?
3 Q Yeah.
4 A It's a long -- okay. All right. So 1997 I
5 lived in Houston, Texas. I went into the Navy in 2002,
6 something like that. I lived in Connecticut for a year
7 or so, lived in -- well, first boot camp in Great
8 Lakes, Illinois and then Connecticut for a year or so,
9 Groton, Connecticut, submarine base. Then off to
10 Seattle -- well, Bremerton, Washington from 2004 to
11 2006 and then Hawaii, then spending some time in Hawaii
12 on another submarine. Then, then Pearl Harbor, Hawaii
13 from two thousand -- I think August of 2006 until,
14 until I got out of the Navy in November of 2008. And
15 then I stayed in Hawaii from 2008 until October of 2014
16 when I moved to Austin. So I moved to Austin in
17 October of 2014, so now we're in 2014 and I lived in
18 Austin until --
19 Q I only asked you up until --
20 A Yeah. Okay. I didn't, I didn't know the
21 (indiscernible) was relevant, but yeah. Okay.
22 THE REPORTER: You didn't know the
23 what?
24 THE WITNESS: The '90s.
25 A You said '97. That was -- okay. Yeah. I

Page 8

2 (Pages 5 to 8)

1 didn't know that -- was that, was that in here?

2 Q No.

3 A Okay. Yeah.

4 Q And then starting in October 2014 you lived

5 in Austin until --

6 A Until --

7 Q Wait.

8 A -- January of 2021.

9 Q Okay.

10 A But I actually owned a house here still until

11 it closed in March of 2021.

12 Q Okay. Do you -- and that was on the Ranch

13 Creek Drive property?

14 A Correct.

15 Q And did you -- do you recall which city

16 council district you were in?

17 A Yes. District 10.

18 Q The whole time?

19 A Yes.

20 Q Okay. Do you know Jennifer Virden

21 personally?

22 A Yes.

23 Q And how did you, how did you come to know

24 her?

25 A Back in I want to say August of 2020 I was

Page 9

1 looking at the state of affairs in Austin, and I was

2 looking, looking for candidates who were running to

3 represent me, my -- where I lived, our home in District

4 10, and she, and she announced she was running for

5 office. So I reached out to volunteer for the

6 campaign, and, and I looked at some of the other

7 options. There was another person running; they didn't

8 respond.

9 So, but she did, and shortly thereafter

10 I had communications with her campaign manager at the

11 time -- not sure his official title, but his name is

12 Brad Parsons -- and met with him and met with Jennifer.

13 They came over to my house, we met, and they, they

14 wanted me to be a volunteer coordinator. And so then I

15 took on -- I want to say in August of that year I

16 became a volunteer coordinator for her city council

17 campaign. And yeah, from there that's where our

18 relationship began.

19 Q Okay. And you said there was another person

20 running at that time. Who was that other person?

21 A Well, so the incumbent was Alison Alter.

22 Q Yes.

23 A And there was another candidate running

24 against her, name of Robert Thomas.

25 Q Okay. Who --

Page 10

1 A And he didn't respond so didn't -- I didn't

2 get anything out of him. I mean, I just, I just wanted

3 to support somebody that was in opposition to the

4 incumbent, and so Jennifer was the first one that

5 responded.

6 Q So did it matter to you whether it was

7 Jennifer Virden or Robert Thomas?

8 A No. At that time I didn't really know either

9 one of them.

10 Q And this makes it sound like you were doing

11 political work. What kind, what --

12 A No. I just was as a citizen wanting to --

13 seeing, seeing what was happening around me with

14 homeless everywhere and defunding the police, and I

15 wasn't happy with that.

16 Q Okay. What do you --

17 A And I had some time. Yeah. What do I do?

18 Yeah. So --

19 Q Go ahead and finish your, finish your answer.

20 A No. Yeah, so I had, I had some spare time,

21 work was kind of slow, so I figured, well, why not, you

22 know? I wasn't initially planning to spend so much

23 time on it, but, you know, somebody needed to do it, so

24 I did it.

25 Q Have you ever run for public elective office

Page 11

1 yourself?

2 A Negative.

3 Q What do you -- what were you doing for a

4 living then?

5 A Yeah. Same thing I'm doing now. So I worked

6 for a company called the Tech -- it's actually a local

7 government corporation called the Texas Conference of

8 Urban Counties.

9 Q It's a local what? I didn't hear you.

10 A Local government corporation. So essentially

11 it's called the Texas Conference of Urban Counties --

12 their offices are down the street -- and they have a

13 subsidiary called Techshare, which is basically an

14 entity that develop- develops, writes, and maintains

15 software for counties in the state of Texas, and the

16 software is criminal justice software. Travis County,

17 for example, is one of the, one of the customers.

18 Q And what do you do in there?

19 A Oh, I'm the IT, the IT -- well, I guess the

20 chief architect for, for, for IT. So essentially I

21 manage the hosting, the security, the firewalls, all,

22 you know, the hacking stuff you were talking about

23 earlier. I do all the, I do all, all the -- I don't

24 hack anyone, but I prevent us from being hacked.

25 Q Okay.

Page 12

3 (Pages 9 to 12)

1 A So it's IT security managing our, our hosting
2 and all of that.

3 Q Before your work on the Virden campaign for
4 District 10 had you done political work before of any
5 sort?

6 A No. Only contributions.

7 Q Okay. Back in the 2014 to 2021 period, other
8 than contributions with respect to Jennifer Virden's
9 campaign did you make any political contributions then?

10 A 2014 to 2021?

11 Q Yes.

12 A Oh, I'm sure I did.

13 Q And what about Austin City Council or mayor
14 races, did you?

15 A No. I didn't really, I didn't really focus
16 on that until 2020.

17 Q And were your contributions, without going
18 into the details yet, primarily in, like, partisan
19 races?

20 A Primarily.

21 Q And primarily I take it from your description
22 to Republican candidates?

23 A Almost exclusively.

24 Q What, what Democratic candidates did you give
25 to?

Page 13

1 A None.

2 Q Okay. Did you give some to Libertarian or
3 other party?

4 A No.

5 Q Why do say "almost exclusively" then?

6 A Well, I don't want to leave -- I don't want
7 to paint them -- I'm not sure, there may be some, but I
8 can't think of any, any -- I can't think of anyone
9 other than Republican candidate I would, I would ever
10 have given to.

11 Q Okay. And did you make contributions both at
12 the -- to partisan races both at the local, state, and
13 federal levels?

14 A No. Only at the federal level.

15 Q Tell me starting in 2014 some candidates at
16 the federal level that you did contribute money to.

17 A I'm not sure. Let's see, 2014.

18 Q Let's start in 2016. That at least cuts out
19 two years of it.

20 A Probably any, any federal Republican
21 candidates at that time.

22 Q You mean you just gave to everybody?

23 A No. I mean, in my, my congressional district
24 perhaps senate, you know, there's two senators in
25 Texas, both of them perhaps, maybe whoever the

Page 14

1 Republican presidential nominee was, that kind of
2 thing.

3 Q Well, I mean, would you give in the primaries
4 too?

5 A No. Not -- I, I didn't start giving that
6 much until recently.

7 Q In primaries you mean?

8 A Well, I didn't -- I mean, money, money
9 doesn't grow on trees, so --

10 Q No, no. I'm trying to distinguish between
11 contributing to these Republican candidates --

12 A Yeah. So --

13 Q Wait, wait. Let me finish my question,
14 because it's hard for her.

15 A My giving is --

16 Q Wait, wait, just --

17 A No, I'm, I'm still talking. So my giving
18 increased more recently, so...

19 Q Okay. That's not my question.

20 A Okay.

21 Q My question is -- or maybe I didn't ever get
22 to my question. My question is this -- let's start in
23 2016. Okay? I'm trying to distinguish between
24 contributions you made to Republican candidates in the
25 general election from contributions you made to

Page 15

1 candidates in the Republican primaries. Okay? That's
2 what I'm trying to distinguish. Did you give money to
3 candidates for federal office in the Republican
4 primaries?

5 A I don't know. I don't remember. Maybe. I
6 don't know.

7 Q Okay.

8 A I know that I gave to John McCain when he
9 ran, when he ran in the primaries, but that was before
10 2014. Other than that I can't think of anyone else.

11 Q So you -- let's, let's just pick the 2016
12 Republican primary campaign for president of the U.S.
13 Did you give any money to him?

14 A I didn't give any -- I don't think -- you
15 know what, actually I don't think I gave to any
16 candidate in 2016, because, because I -- because, you
17 know, Trump got the nomination. I figured he's got
18 plenty of money, so I didn't want to bother giving him
19 any money, so -- plus I didn't really like him. Did
20 not like him, don't like him, never did. So yeah, so I
21 don't think -- I may not have given to anyone in 2016.
22 Who knows. You'd have to go back and -- but you can
23 look at the records, right, the FEC records --

24 Q Right.

25 A -- and find out.

Page 16

4 (Pages 13 to 16)

1 Q Right.

2 THE REPORTER: Could I ask you to

3 slow down a bit? You're kind of slurring your words

4 together, and it's making it a little hard for me to --

5 THE WITNESS: Okay. Sorry.

6 THE REPORTER: Thank you.

7 THE WITNESS: I'm a fast talker.

8 THE REPORTER: Yeah.

9 Q In which sense did you use that term? Just

10 kidding. So in 2020 --

11 A Yes the.

12 Q -- in the Republican primary campaign for

13 president -- I don't guess there was much of a fight,

14 as I think about it, was there? Did you give to Trump?

15 A Yeah, I did.

16 Q In the primary?

17 A Yes.

18 Q Do you plan --

19 A I'm not sure in the primary, but I know -- I

20 think I gave to him after that. I can't remember, but

21 probably -- I may have.

22 Q So --

23 A My wife probably did. I'm sure my wife did.

24 Q So you may not have seen, but I'm guessing

25 you did, that Mr. Trump has announced he's running for

Page 17

1 president in '24.

2 A Yeah.

3 Q And do you anticipate making a contribution

4 to him in connection with that campaign?

5 A Definitely not.

6 Q Why not?

7 A I don't like him.

8 Q Okay.

9 A But I will be making a contribution to

10 whoever the competition is.

11 Q In the primary you mean?

12 A Yes. I have contributed to Nikki Haley

13 already, and I may even contribute to Ron DeSantis.

14 Q Nikki Haley already in connection with 2024?

15 A Well, she has an ongoing --

16 Q Well, I --

17 A She's raising money ongoing.

18 Q That's just a question.

19 A I don't know. I just know I contributed to

20 her recently. Yes, for 2024 if that's what it is.

21 Q But for what office?

22 A President.

23 Q Okay. But you also mentioned Mr. DeSantis,

24 Governor DeSantis.

25 A Mm-hm.

Page 18

1 Q Are you thinking you'll also contribute to

2 him possibly for the 2024 race?

3 A Yeah. If it, if it becomes clear that he's

4 the frontrunner, perhaps. Yes.

5 Q What if it's not clear between him and Nikki

6 Haley?

7 A Well, it's going to be, it's going to be

8 anyone other than Trump that's a Republican for me.

9 Q Right. But I'm saying what if, what if it's

10 Haley and DeSantis vying for this, which one will you

11 give to?

12 A Probably Nikki Haley. Until she's out I'll

13 give it to her.

14 Q Are you a registered voter now?

15 A Yes.

16 Q In Montgomery County?

17 A Yes.

18 Q When did you switch from -- well, were you a

19 registered voter in Travis County when you lived in

20 Austin?

21 A Yes.

22 Q When did you switch from Travis County to --

23 A Well, I moved --

24 Q -- to Montgomery -- make sure for her and for

25 clarity you let me finish the question. I know you

Page 19

1 anticipate what it's going to be.

2 When did you switch from Travis County

3 to Montgomery County as a registered voter?

4 A I moved to Montgomery County in January of

5 2021. The first election I voted in in Montgomery

6 County was November of 2021. So that -- I would think

7 that that's when I registered. I'm sure -- somewhere

8 between when I moved and when I voted.

9 Q Okay.

10 A I don't know exactly when.

11 Q Okay. And since you weren't registered here

12 I think it's fair to assume, and correct me if I'm

13 wrong, that you did not vote in the mayoral, Austin

14 mayoral race that --

15 A Sure.

16 Q Let me finish, because it's hard for her.

17 A Okay.

18 Q In the mayoral race that just concluded on

19 November 8th, right?

20 A Right.

21 Q Are you aware of the outcome of that race?

22 A Yes.

23 Q And you are aware that Ms. Virden finished

24 third, didn't get into the runoff, and got about 18

25 percent of the vote?

Page 20

5 (Pages 17 to 20)

1 A Yes.

2 Q Do you intend to make any campaign

3 contributions to either of the two mayoral candidates

4 in the runoff?

5 A No.

6 (Exhibit No. 3 marked.)

7 Q Now I'm going to ask that you take a look at

8 what's been marked as Deposition Exhibit 3.

9 A Okay.

10 Q Let me represent to you that that's the

11 ordinance that the Austin City Council passed back in

12 October of 2017 --

13 A Mm-hm.

14 Q -- that set out the campaign finance rules

15 that you and Ms. Virden are challenging. Okay?

16 A Right. It essentially bars a candidate from

17 campaigning until the arbitrary deadline in November,

18 which is what I -- why I'm here.

19 Q I don't think it says arbitrary, does it?

20 A Well, I'm saying it's an arbitrary deadline.

21 Q Okay. And why do you care about this

22 ordinance?

23 A Because, because the citizens of Austin are

24 basically not allowed to voice, unless they're a

25 Democrat, and they're, they're not allowed to voice

Page 21

1 their opinion. The candidate -- I'm not running for

2 office, but this candidate -- Jennifer Virden as a

3 candidate was, and she couldn't campaign, because if

4 you can't raise money, you can't campaign.

5 Q Well, you can campaign with your own funds,

6 correct?

7 A Well, that's -- yeah. If you have them,

8 but not everyone has a lot of money, right? And if

9 you -- how much, how much of your own funds do you want

10 to get into?

11 Q Well, let's assume that you have \$300,000

12 that you can loan to your campaign and you can spend

13 that before what you call the arbitrary deadline.

14 Doesn't that allow you to campaign?

15 A Perhaps. I'm not going to, I'm not going to

16 go down -- that's, that's -- you're -- that's a --

17 you're making a --

18 Q Well, I get to ask the questions.

19 A Well, you're asking a hypothetical.

20 Q Yes. That's what I'm asking you.

21 A You're asking a hypothetical question, right?

22 Q Yes.

23 A Possibly. I don't know the answer. But if

24 you have those, if you have those funds and you want to

25 use your own money, then sure.

Page 22

1 Q Then you --

2 A But generally candidates don't do that, do

3 they?

4 Q You understand that Ms. Virden loaned her

5 mayoral campaign --

6 A No. I understand.

7 Q May I finish the question, please? Remember

8 that. Okay?

9 You understand that Ms. Virden loaned

10 her campaign \$300,000 in the mayoral race.

11 A Yes.

12 Q Okay. And what kept her from spending that

13 before this deadline that you're concerned about?

14 A I don't know, but perhaps she wasn't sure if

15 she was going to be a viable candidate back then.

16 She -- you have to first see if you can raise money to

17 see if you're a viable candidate. So if you can't even

18 go out there and test the waters by trying to raise

19 money, why would you, why would you sink \$300,000 of

20 your own money into a campaign when you don't even know

21 if you have support.

22 So the way you determine if you have

23 support is by seeing if you can raise money, by seeing

24 if the people are interested. I was interested, and a

25 lot of people were, and we couldn't contribute.

Page 23

1 Q But you could tell her you were interested.

2 A Oh, well, she knew that. She knew that, of

3 course.

4 Q Well, why doesn't that tell you whether

5 you're a viable candidate?

6 A Well, just me, you know, I could tell her,

7 but I mean, but actually pledging money and giving

8 money is, is a, is a much bigger commitment. You can

9 say you'll do something, but until you've actually done

10 it, that's a, that's a whole different level of

11 commitment.

12 THE WITNESS: Did you get all that?

13 THE REPORTER: I did. Thank you.

14 Renea, I hate to ask this, but I need a real quick

15 break.

16 MR. HICKS: No. Absolutely not

17 (laughing).

18 (At 11:54 a.m. the proceedings

19 recessed, continuing at 12:00 p.m., after which Exhibit

20 No. 4 was marked.)

21 Q (By Mr. Hicks) Mr. Clark, I want you to take

22 a look what you've got in front of you, Exhibit 4.

23 A Mm-hm.

24 Q Do you recognize that document?

25 A Yes, I do.

Page 24

6 (Pages 21 to 24)

1 Q It's your -- it's, it's basically yours and
2 Ms. Virden's lawsuit against the city, correct?
3 A Right.
4 Q So do you understand that Ms. Virden filed
5 the initial lawsuit in this matter back in March in
6 2021?
7 A Yes. I understand that.
8 Q Okay. And then you joined in the lawsuit in
9 September of this year, correct? This shows it was
10 filed at the top there 9/21/22. I'll represent to you
11 this is your first formal appearance in the lawsuit
12 here as a plaintiff.
13 THE WITNESS: Is that right? What
14 are the -- are those dates right?
15 MR. NAJVAR: Well, I do want to
16 clarify. This date is when the Court put it on the
17 docket, but this -- you know, I filed the motion for
18 leave to amend months before this. It was, like, six
19 months or four months earlier.
20 THE WITNESS: That's what I
21 understand.
22 MR. HICKS: And the record will
23 reflect that. I'm --
24 MR. NAJVAR: Okay. Yeah.
25 MR. HICKS: -- not arguing with

Page 25

1 that. I'll accept that.
2 Q But let's assume it's four months before for
3 purposes of this discussion, that it was in May of
4 2022. Okay? Let's assume that's when you made the
5 first effort to join through your lawyer. Can you tell
6 me why you waited?
7 A I didn't wait. I don't think I waited. I
8 think I was on board with this lawsuit all along. I
9 think it was just a matter of the filings.
10 Q Well, I'm not asking what your position was
11 on the lawsuit. I'm asking why you weren't a plaintiff
12 in the lawsuit.
13 A I wasn't asked, or maybe I wasn't aware of
14 it. When I became aware of it I immediately jumped on.
15 Q So you didn't know about the lawsuit back
16 in -- when it was first filed?
17 A I think I did. I think I knew about it
18 before it was filed.
19 Q Okay. So you knew about the lawsuit but you
20 didn't join.
21 A Well, I mean, I mean, I don't -- I think, I
22 think the -- I think Jennifer's attorney, the attorney
23 was handling that, so I don't know.
24 Q Well, why didn't you say, I want to be a
25 plaintiff, back then?

Page 26

1 A I think I did, and I don't know -- for
2 whatever reason. Your dates may be -- maybe your dates
3 are wrong. I don't know.
4 Q Let's assume my --
5 A I was on board with this lawsuit all along.
6 Q I'm not asking whether you were on board.
7 I'm asking about being a plaintiff. Okay?
8 A Essentially that's the same thing. I wanted
9 to be a plaintiff all along.
10 Q Well, they aren't the same thing. They may
11 be to you, but --
12 A Well, I -- they mean -- I was -- the intent
13 is the same. My intent was the same. My intent was
14 to support this lawsuit all along. That's what
15 I'm --
16 Q I'm not asking that question. My question,
17 as I've said, is not whether you're on board with it,
18 support it. My question is why didn't you become a
19 plaintiff when it was filed?
20 A Maybe -- I guess because I wasn't asked or I
21 wasn't aware that that was something I, I could do.
22 Q Did you ask to become a plaintiff?
23 A No. I don't think I ever asked, but it was
24 mentioned, it was discussed, and then I became, then I,
25 then I became a plaintiff apparently. So I mean --

Page 27

1 Q What do you mean "apparently"?
2 A I mean I never had discussions with anyone
3 about being a, you know, quote/unquote, plaintiff.
4 Okay? I know that I supported the lawsuit. I
5 supported -- I was against the fact that Jennifer
6 couldn't raise funds during the, the blackout period,
7 because, you know, she's not an incumbent and she needs
8 to get her message out. She has, she has constituents,
9 she has, she has, she has an agenda which matches my
10 agenda, which is, you know, a voice for, for the
11 rest -- for the few people that maybe don't agree with
12 everyone else, and we, we -- and that's just what we
13 wanted. We wanted to be represented. So, you know, as
14 far as the technical of when the lawsuit was filed or
15 when it -- what, what date I became a plaintiff, that's
16 up to the, up to the lawyers. I don't know.
17 Q Well, did you know you'd been made plaintiff?
18 A No. Like I said, I don't even -- the word
19 "plaintiff" never came up. I don't know. I just know
20 that I supported the lawsuit all along.
21 Q How did you learn that you were a plaintiff
22 in the lawsuit?
23 A I guess either, I guess -- I think that I was
24 asked to join, I guess at some point. Do, do -- I
25 think the question I received was, "Do you want to give

Page 28

1 a" -- "would you be willing to support the lawsuit?" I
2 think the answer was yes from me. So Jennifer asked,
3 you know, "Would you be willing to jump on this,
4 support this lawsuit?" I said yes, you know, because
5 obviously I wanted her -- you know, to give money and I
6 couldn't. I think I had -- we had -- like you said, I
7 was, I was on board all along. So --

8 Q Let me interrupt a second. I'm not
9 criticizing anything you're saying, it's just you're
10 talking really fast.

11 A Well, what specifically do you want to know?
12 I'm trying to get -- what, what --

13 Q Well, I know. Can you just -- first point is
14 can you just slow down? Because she's having a hard
15 time keeping up.

16 THE WITNESS: Sorry. Why can't
17 they let you record my voice? It's easier.

18 Q So I will -- you were giving a nonresponsive
19 answer, but that's okay. Let's just terminate the --

20 A Well, no. I'm trying, I'm trying to -- what
21 is your -- can you rephrase the question? Maybe I can
22 answer succinctly.

23 Q When were you told you were going to be a
24 plaintiff?

25 A I don't remember exactly.

Page 29

1 (Exhibit No. 5 marked.)

2 Q You have in front of you what's been marked
3 as Exhibit 5 for your deposition. Do you see the
4 heading there is Plaintiffs' First Amended Initial
5 Disclosures?

6 A Yes.

7 Q And it shows at the back that it was served
8 on me on October 3rd, 2022 after you became a
9 plaintiff. Okay. Read on the first page there that
10 bolded Paragraph A. You can just read it to yourself
11 if it's easier. And then scroll down further down the
12 page. Right on that same page you'll see your name, I
13 believe. Do you --

14 A Yes. I see that.

15 Q -- see that?

16 A Yes.

17 Q Okay. You see at the end there your block or
18 your name and address?

19 A Mm-hm.

20 Q It says, "Submitted verification of intent to
21 contribute dated March 30, 2021." Do you see that?

22 A Yes. I mean, that makes sense.

23 Q Okay. And we'll go into the details of that
24 verification in just a second, but other than what's
25 stated in the verification, to your knowledge do you

Page 30

1 have any knowledge of facts that have to do with this
2 case separate from what it's in your verification?

3 A I know that as soon as Jennifer announced she
4 was running for mayor I immediately wanted to
5 contribute that day and I was unable to do so.

6 Q That wasn't my question. I said do you have
7 any --

8 A I want that on the record.

9 Q Do you have any -- I know, but you're
10 supposed to answer my questions. Your attorney can ask
11 you questions. Okay?

12 A Okay.

13 Q So do you have any knowledge of facts other
14 than the facts based in the verification itself that
15 you consider pertinent to this case?

16 A No.

17 Q Okay.

(Exhibit No. 6 marked.)

18 Q Mr. Clark, you have in front of you an
19 exhibit marked Exhibit 6 to this deposition.

20 A Yes.

21 Q Do you recognize that?

22 A Yes, I do.

23 Q What is it, just briefly? We'll go into
24 details.

25

Page 31

1 A Well, this is what I signed when I joined the
2 lawsuit, I believe. Yeah. So this March, I wanted to
3 contribute in March or even earlier than that, as soon
4 as she announced -- whenever she announced her
5 candidacy I wanted to contribute. I wasn't able to do
6 so, so I was asked -- so I joined the lawsuit, and, and
7 this is me basically saying that I wanted to contribute
8 and I was unable to do so.

9 Q When you say you joined the lawsuit what you
10 mean is you submitted this verification, right?

11 A Correct.

12 Q And this verification was your way of showing
13 support for the lawsuit, correct?

14 A Yes.

15 Q How did you get the, the verification draft
16 that you then filled in?

17 A From this gentleman here, the attorney.

18 Q Mr. Najvar?

19 A Yes. I think. I don't know how else I would
20 have gotten it, but...

21 THE WITNESS: Do you know?

22 MR. NAJVAR: I can't, I can't chime
23 in yet, but --

24 THE WITNESS: Okay.

25 MR. NAJVAR: -- I can ask if I need

Page 32

8 (Pages 29 to 32)

1 to follow up -- just for sort of procedural so you
 2 understand, when he's not asking questions if I need to
 3 clarify something or follow up, I can, I can ask my own
 4 questions.
 5 A So presumably I would have gotten it from
 6 either the attorney in this case, which is Mr. Najvar
 7 here, or from the, from the campaign maybe -- I mean
 8 from the candidate. I don't recall exactly who gave me
 9 the document.
 10 Q (By Mr. Hicks) Do you recall discussing this
 11 with Ms. Virden?
 12 A Not much. I don't think I ever really maybe
 13 discussed it with her really at all, but I did discuss
 14 it with her, her campaign sort of manager/field
 15 coordinator in the previous campaign.
 16 Q Who was that?
 17 A Brad Parsons. I did discuss it with him.
 18 Q And what was -- tell me what y'all discussed.
 19 A The, the issue we couldn't raise money
 20 because of this law, this blackout law. We thought it
 21 was unconstitutional. In other words, she was, yeah,
 22 she was prevented from contributing during this, I
 23 think it's called, blackout period. I believe that's
 24 written down somewhere. Anyway, so unable to
 25 contribute during this period of time from all the way

Page 33

1 from March all the way until November.
 2 Q Okay. This --
 3 A And so I wanted to, I wanted to get involved.
 4 Q That wasn't, that wasn't my question. My
 5 question was, what did you discuss with Mr. Parsons?
 6 A What I just said, that I was unable to
 7 contribute all the way from March until November and
 8 then that that was unfair.
 9 Q I asked what you discussed about this
 10 document.
 11 A That exact -- I just told you what I
 12 discussed.
 13 Q That's it?
 14 A Yeah. That's it.
 15 Q Okay. And did he tell you what this document
 16 was in effect saying?
 17 A No. He didn't need to do that. I can read
 18 it myself.
 19 Q Did you read it yourself?
 20 A Yes.
 21 Q Okay. As you sit here today, do you have
 22 anything in this document -- "this document" being
 23 Exhibit 6 -- that you want to change or correct?
 24 A No.
 25 Q Okay. Let's look at Paragraph 2 of

Page 34

1 Exhibit --
 2 A Okay.
 3 Q That front page there, short sentence.
 4 A Right.
 5 Q At the time you signed this did you know
 6 whether Jennifer Virden was running for city council or
 7 mayor?
 8 A Right. So we --
 9 Q Wait, wait. Answer the question.
 10 A No. I did not.
 11 Q Okay. Did it matter to you?
 12 A No. It did not.
 13 Q Now look at Paragraph 3 and look at the first
 14 sentence there. Just read that to yourself.
 15 A Right. So yeah. I --
 16 Q Wait, wait. Wait till I ask the question.
 17 A Okay.
 18 Q Okay. So in there you mention that you
 19 support Virden's vision. What was it about -- what was
 20 Virden's vision that you supported?
 21 A Fiscal responsibility, low taxes, and a
 22 government accountable to the citizens and not to a
 23 single political party. In other words, representing
 24 all the taxpayers, advocating for fiscal restraint,
 25 responsible city government.

Page 35

1 Q I didn't hear the last part. Sorry.
 2 A Responsible city government.
 3 Q And you say later in that same sentence that
 4 you thought it was imperative that she begin
 5 fundraising as soon as possible --
 6 A Yes, I did.
 7 Q -- instead of waiting. So what do you mean
 8 by "imperative"?
 9 A Imperative, just what it, just what it
 10 means: Urgent, critical. In other words, the
 11 incumbent can -- the incumbent has their message out,
 12 right? They're, they're in office, they can, they can
 13 essentially campaign all they want to. And Jennifer as
 14 a candidate for either city council or mayor to
 15 represent my -- representing me as someone who wants
 16 responsible city government wasn't able to campaign.
 17 So that's why I use "imperative."
 18 Q Okay. And let's assume -- let's set aside
 19 the city council, the district race for a second. You
 20 understand she ended up running for mayor, right?
 21 A Yes. I understand.
 22 Q And you understand that when she ran she did
 23 not run against any incumbent, don't you?
 24 A I understand.
 25 Q Okay. So what does your point about the

Page 36

1 incumbent have to do with it then since she wasn't
 2 running against an incumbent?
 3 A Well, we didn't know at the time. We didn't
 4 know at the time whether or not she'd be running
 5 against an incumbent or a -- or, or not.
 6 Q Well, with regard to the mayor's race what
 7 does that --
 8 A Well, if you're setting, you're setting aside
 9 the city council race and if she was running again the
 10 same race, same seat, which was City Council District
 11 10 against -- that would have been the incumbent Alison
 12 Alter yet again. Depending on the redistricting.
 13 There was redistricting in Austin, and so that was all
 14 up in the air.
 15 But we -- it was intentionally running
 16 against an incumbent, and obviously democ- Austin is
 17 completely controlled by the Democratic Party, wholly
 18 controlled. So you're obviously running against the
 19 party in reality. So they control Austin, so...
 20 Q What does that have to do with the incumbent
 21 though?
 22 A Well, you're running, you're running -- the
 23 entire city government is controlled be a single party.
 24 So we're running against not just a single person,
 25 we're running against the entire infrastructure.

Page 37

1 Q So you knew ahead of time that everybody that
 2 was going to be running for any office she ran for was
 3 going to be the supported by the Democratic Party?
 4 A Anyone of any -- that would -- yeah, for the
 5 most part. Anyone that had any traction or significant
 6 support would have been a candidate for the Democratic
 7 Party. Of course I knew that.
 8 Q Because those are the only people that can
 9 win in Austin?
 10 A Correct.
 11 Q Then why would you support somebody that's
 12 bound to lose?
 13 A Because, because she needed to have a voice.
 14 All the people need to be represented.
 15 Q Okay. Well, you understand from what you're
 16 saying she had no chance of being represented.
 17 A No. She had a chance, but you've got to
 18 start some- she had a -- you always have a chance, but,
 19 you know, the odds are stacked against her. They're,
 20 they're stacked even further by being unable to raise
 21 money because of this, this law, this unconstitutional
 22 law that prevented her raising money till November.
 23 Q And how does that stack it against her?
 24 She's on the same footing, you understand, as everybody
 25 else running. None of them can raise funds then --

Page 38

1 A Not --
 2 Q -- either. Wait, let me finish the question.
 3 None of them can raise funds either, right?
 4 A Because they are members of the Democratic
 5 Party, which controls Austin. And if there's an
 6 incumbent, which in this case there wasn't, but if
 7 there was, they would have had that advantage.
 8 Q So what you're saying is, my -- tell me if
 9 I've got it wrong. It's my understanding that your
 10 problem with this rule about when you can fundraise --
 11 A Mm-hm.
 12 Q -- is that it benefits, in Austin it benefits
 13 the Democratic Party?
 14 A It benefits one single party over all -- over
 15 everyone else. So nobody else matters. Nobody else's
 16 point of view matters.
 17 Q Nobody, nobody else from the Democratic Party
 18 you mean?
 19 A Right. Well, in my statement I pointed out
 20 how it's dangerous that one party controls city
 21 government, has sole control. It's in one of my
 22 statements here. Maybe not this one, maybe the other
 23 one. Or maybe it's in Amendment 2. Maybe you should
 24 look in Amendment 2.
 25 Q Maybe what?

Page 39

1 A The other, the other statement.
 2 Q Are you looking at Exhibit -- what exhibit
 3 number are looking at there?
 4 A So now I'm looking at the --
 5 Q The complaint. Okay.
 6 A Yeah.
 7 Q Okay.
 8 A So unlike, unlike the Texas Legislature, the
 9 city council meets year-around. The incumbent mayor
 10 and council members are free year-around to promote
 11 their agenda and propagate their messages.
 12 Q Yeah. But the question had to do with the
 13 Democratic Party. That's what you said one-party
 14 control, and that's what you didn't like about this
 15 rule, that it benefited that one party's control.
 16 A Whoever the party. If it was -- no matter
 17 who the party is, it's wrong, right? There should
 18 always be representation from multiple parties.
 19 Q What do you -- by "party" what do you mean?
 20 A Political party.
 21 Q Okay.
 22 A Different points of view.
 23 Q Okay.
 24 A We need to have consensus government.
 25 Q Okay.

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10 (Pages 37 to 40)

1 A Not a majoritarian. We're not tyranny of
2 majority.

3 Q And how, how does, how does the fundraising
4 rule keep their -- that you're challenging keep there
5 from being diversity of political views?

6 A Because essentially you're only -- the only,
7 the only candidate that can challenge for office, for
8 office in Austin is the candidate that has a lot of
9 money, because they can't raise money -- based on this
10 law they, they can't -- they're prevented from raising
11 money. So the only way they can do it is having a lot
12 of their own money that they're willing to throw in
13 that's going to be, you know, flushed down the -- so
14 essentially it's, it's, it's -- unless you're wealthy,
15 you have no voice.

16 Q Is 300 --

17 A If you don't agree with the Democrats and you
18 don't have any money, you don't exist.

19 Q Well, I'm getting confused about your
20 constant reference to the Democrats in this situation,
21 so I'm not sure. Let me tell you what I'm taking from
22 this --

23 A Mm-hm.

24 Q -- and you tell me what I'm getting wrong
25 about it.

Page 41

1 A Right.

2 Q It sounds like you're saying Democrats
3 control city government, elective city government
4 positions.

5 A Right. That's correct.

6 Q Okay.

7 A Yeah.

8 Q And the problem that you have with the
9 fundraising rule is that it benefits Democrats.

10 A It benefits one party over, over all others.

11 Q That party being Democrats, right?

12 A Yeah. If it was Republicans, it'd be the
13 same thing. If it was solely controlled by
14 Republicans, that would be bad. I'm, I'm against one
15 party solely controlling any government.

16 Q And but I, I -- the next step for me, and my
17 question is, how does the one-year fundraising-window
18 rule benefit Democrats in --

19 A It benefits --

20 Q -- city council -- wait, let me -- in city
21 council races?

22 A It benefits the controlling party.

23 Q Wait. How does it benefit Democrats? That's
24 my question.

25 A It benefits the controlling party, which

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1 happens to be Democrats. It doesn't matter if -- it
2 could be Republicans. Whoever, whoever the -- it
3 doesn't matter who the party is. The point is, is that
4 one party is in control and everyone else is unable to
5 raise money unless they have -- unless they're a
6 millionaire or billionaire. Unless they're wealthy,
7 they can't do anything.

8 So essentially there's no way for my
9 voice to be heard, because no candidate can, can
10 campaign because unless they're, unless they're
11 wealthy. That's, that's not, that's not -- that's
12 unconstitutional, it's not American, it's bad. I'm
13 sure everyone would agree on that.

14 Q Just so you know, the Supreme Court doesn't
15 agree.

16 But, so do you consider having \$300,000
17 to throw at your campaign to be having money?

18 A If the -- if she -- now, again you're saying
19 this candidate. I'm not -- this isn't just about this
20 candidate. This is about all candidates running for
21 office.

22 Q That wasn't my question though.

23 A I didn't join the lawsuit just for --

24 Q Wait, wait. Answer my question.

25 A Well, what is your question again?

Page 43

1 MR. HICKS: Can you read it back?

2 Q Do you consider \$300,000 -- I'll just say it.
3 Do you consider \$300,000 to have available for the
4 Virden -- Ms. Virden has for her campaign, do you
5 consider that to be the kind of money you're concerned
6 about people being able to spend outside the
7 fundraising window?

8 A That -- it's a start. That's a start, but
9 it's not -- that's not nearly enough.

10 Q Okay. I'm going to come back to this. It's
11 a little unclear to me, but I'll come back to it.

12 Okay. Let's look at the third sentence in paragraph 3
13 of Exhibit 6.

14 A Okay. Third sentence.

15 Q It's the one that begins, "I want Virden to
16 be able to."

17 A Yeah. "I want Virden to be able to raise
18 funds for her campaign immediately" --

19 Q Yeah.

20 A -- "without waiting for arbitrary date set by
21 the city council" -- "by the city."

22 Q Right.

23 A Do you want me to keep reading?

24 Q No. I didn't even want you to read at all.

25 A Okay.

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1 Q So you use there the term "arbitrary date."
2 A Yes.
3 Q What do you mean by arbitrary?
4 A Arbitrary is a date without meaning, that has
5 no meaning.
6 Q Okay. And how do you consider that date of
7 one year before to have no meaning? It has legal
8 meaning. It says you can't do it, right?
9 A Right. Arbitrary in a sense that you set a
10 date without a reason for setting that specific date.
11 Okay? In other words, if, if you were getting married,
12 okay, and we, we chose September because you -- and
13 we're going to get married in Hawaii, you love the
14 weather in Hawaii in September, that would have a
15 meaning. There's a reason why you chose that date.
16 There's no -- as far as I'm aware,
17 there's no reason why there's a one-year blackout in
18 raising funds. That's an arbitrary date. There's no
19 reason for setting that date.
20 Q Can you think of any date that wouldn't be
21 arbitrary in terms of a blackout period?
22 A It would just -- you have to give me a
23 reason. I mean --
24 Q No. Can you think of a date?
25 A I possibly could, but I'm not advocating for

Page 45

1 any blackout period, so why would I do that?
2 Q So what would you take into account if you
3 were picking a date and not making it arbitrary?
4 A Well, I'm not arguing for anybody.
5 Q No. That's not my question.
6 A Well, I'm not going to, I'm not going to --
7 Q You need to answer my question.
8 A Well, I'm not going to pick a date. I would,
9 I would --
10 Q What would you take into account in picking a
11 date is what I said.
12 A I haven't -- I'd have to give it some
13 thought. I haven't --
14 Q Well, give it some thought now and then
15 answer the question.
16 A Well, I'm not advocating for --
17 Q I'm not asking what you're advocating for.
18 I'm asking --
19 A Well, it would require, it would require more
20 thought. It would require careful thought and study,
21 and we -- I don't have time to do that right now.
22 That's my answer.
23 Q So you don't know.
24 A I don't agree with any arbitrary date.
25 Q That's -- do you agree with any date?

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1 A Possibly.
2 Q Okay.
3 A It depends on --
4 Q So I'm trying to -- you're opposed to an
5 arbitrary date, but you're possibly okay with a date
6 for the cut-off period but you don't know what that
7 date would be and you don't know what factors to take
8 into account. Is that fair?
9 A Well, what I'm saying is, is --
10 Q Wait. Is that fair? If it's not fair, then
11 you can go ahead and --
12 A Well, let me rephrase my --
13 Q No. Don't rephrase. Answer my question.
14 A Well, you're rephrasing my answer. That's
15 not my answer.
16 Q No. I'm just saying -- if I got it wrong,
17 that's fine.
18 A You got it wrong.
19 Q Okay.
20 A Okay. So what I'm saying is, is I don't
21 believe there should be any date limiting any candidate
22 from running for, for office.
23 Q For fundraising.
24 A Correct.
25 Q Okay. That gets there. You understand,

Page 47

1 don't you, that the Texas Legislature has rules that
2 prevent fundraising within certain periods of the
3 regular session?
4 A I understand the Texas Legislature meets in
5 session every other year.
6 Q Wait. Answer my question first and then give
7 me what you want to talk about.
8 A I understand the -- you're, you're making me
9 aware of that. Yeah. I understand that, and then
10 again, the Texas Legislature only meets in session
11 every other year. So it's a, it's a difference -- that
12 body of government is different than this body of
13 government.
14 Q Okay. And what makes it different?
15 A That they are in session only on, what is it,
16 odd years? Even years? Do you remember? Odd years,
17 even years, whatever it is, and the Austin City Council
18 is always in session.
19 Q Okay.
20 A The mayor and city council are always in
21 session, always making decisions that affect the lives
22 of people in Austin, whereas the legislature -- those
23 rules are for the legislature. They're not, they are
24 not applicable to the City of Austin where the city
25 council and the mayor are, are making decisions year

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1 around.

2 Q Okay. And so is it your sense of things that

3 it would -- if, if there is an Austin City Council

4 that's sitting and let's say half the city council

5 seats and the mayoral seat are up in the next election

6 that those -- and those people are running as

7 incumbents --

8 A Mm-hm.

9 Q -- that they should just be able to raise

10 funds whenever they want to, campaign funds whenever

11 they want to?

12 A Okay. Say it again? Say it one more time?

13 I'm sorry.

14 Q I may say it a little differently, but is it,

15 is it your view --

16 A Okay.

17 Q -- that if you have a situation where you

18 have half the city council seats up for election in two

19 years --

20 A Mm-hm.

21 Q -- and the mayoral seat up for election in

22 two years --

23 A Okay.

24 Q -- and all of the sitting council members are

25 running in those elections as an incumbent for

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1 reelection, okay?

2 A Okay.

3 Q Is it your view that those incumbents should

4 be able to raise funds year around without any

5 fundraising window?

6 A So even the ones that are not up for election

7 can raise funds?

8 Q No. I said the ones --

9 A Yeah.

10 Q -- up for election.

11 A Yes. Anyone up for election should -- anyone

12 who's vying for an office should be able to raise

13 funds.

14 Q Including incumbents?

15 A Including incumbents.

16 Q At any time?

17 A Yes. Now, that's the City of Austin. I'm

18 not saying -- I'm saying the City of Austin. I'm not

19 saying this is the case for the state legislature. I

20 understand the law for the state legislature. That's

21 for them. I think the idea of the law maybe it's to

22 prevent some sort of corruption in the legislature,

23 right? That's probably the idea of the law, but that

24 does not apply here. The intent of the law does not

25 really apply to the City of Austin.

Page 50

1 Q Why?

2 A Because like I said earlier and as is stated

3 in the complaint, the legislature meets every other

4 year, whereas the City of Austin is always, always

5 meeting.

6 Q Right. But why is corruption, the threat of

7 corruption different?

8 A Well, so you -- so essentially, I mean,

9 there's, there's always a threat from it, but you're

10 limiting -- you're, you're, you're -- basically in the

11 city of Austin you're saying the opposition can't

12 campaign, and the, and the incumbents can. Just by

13 virtue of having that office they can campaign. If you

14 can't raise money, you can't campaign.

15 Q But as I understand it, you're saying, and

16 tell me if I'm wrong, as I understand it, you're saying

17 you understand the rationale for the legislative, state

18 legislative rule about not raising funds before a

19 session to be addressing the issue of corruption in

20 connection with contributions, correct?

21 A Possibly. I don't want to, I probably

22 don't -- I don't want to get into that.

23 Q You did get into it, so I just wanted to find

24 out --

25 A Yeah. I shouldn't have even got into it, but

Page 51

1 anyway, the point is, is in Austin --

2 Q Wait, wait. So are you backing off what you

3 said about the corruption thing in the state

4 legislature?

5 A Yeah. I'm not sure about that. I'd have to

6 do more research in the law, but -- and I'm not a

7 lawyer. So, and I'm not really that interest- to me

8 I'm just saying that in Austin I think it's unfair that

9 the city council candidate or mayoral candidate cannot

10 raise funds during the period. That's what I'm saying.

11 That's my concern.

12 Q Okay. Now, still in that Exhibit 6, the

13 fourth sentence, it's the one that's at the bottom of

14 the page there --

15 A Okay.

16 Q -- that runs over, "I also want Virden to be

17 able to." Do you see -- well, it starts on the

18 previous page.

19 A Yes.

20 Q And I've asked this of everybody, because I

21 have a hard time understanding. Tell me what your

22 point is there.

23 A I want, that I want Jennifer Virden -- I

24 wanted Jennifer Virden to be able to establish her

25 campaign, and you have to have money to establish a

Page 52

1 campaign.

2 Q Okay.

3 A That's the point.

4 Q All right. So you start off saying, "I want

5 her to be able to begin building her campaign account

6 immediately," which I take to mean raising campaign

7 contribution funds, right?

8 A Yes.

9 Q "So that she can use funds collected closer

10 to election day when she determines necessary." What

11 do you mean by closer to election day?

12 A It says "now and closer to election day." I

13 mean, maybe it's missing an "and."

14 Q It says "use funds collected now."

15 A "Now closer to" -- I think it's missing -- is

16 it? This says "collected now," and it says "closer" --

17 it doesn't make any sense. So I think, I think it's --

18 Q Thank you. That's what I've been trying --

19 A I think it's missing an "and."

20 Q So there is a correction you would make?

21 A Yeah. I think, I think it should be "and."

22 Q "And" closer to election.

23 A Yes.

24 Q Okay.

25 A But -- yeah.

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1 Q Now look at paragraph 4 of that exhibit.

2 That's the one where you said, If I could, I'd give her

3 \$400 now, correct?

4 A Yes.

5 Q And "now" being back in March --

6 A Yes.

7 Q -- of 2021.

8 A Yes.

9 Q Were you ready, willing, and able to do that?

10 A Yes.

11 Q How did you pick the amount?

12 A I think it's the maximum amount. I think it

13 actually turned out to be \$450, but yeah, whatever the

14 maximum amount. The previous -- the maximum amount in

15 the, in the previous campaign was \$400 per person, and

16 so that's why I -- that's how I picked that amount.

17 Q Okay.

18 (Exhibit No. 7 marked.)

19 Q I'd ask you to take a look at the exhibit in

20 front of you, which is Exhibit 7.

21 A Yes.

22 Q And to make certain, from Jennifer Virden's

23 Campaign Finance Report dated October 7, 2020 in

24 connection with her general election race for Council

25 District 10?

Page 54

1 A Okay. Yeah.

2 Q Right?

3 A Yeah.

4 Q Look at the last page in the second box.

5 A Okay.

6 Q It shows that on August 31st of 2020 you

7 contributed \$200 to her campaign; is that correct?

8 A Yeah. I guess it does. Okay. Yeah. That

9 was the only contribution. That is correct.

10 Q And I'm sorry that this may be repetitive of

11 some of your answers --

12 A Mm-hm.

13 Q -- to the interrogatories, but I didn't get

14 those in time to fully integrate them, wherever they

15 were. Hold on a second. Okay. Let's look at...

16 (Exhibit No. 8 marked.)

17 Q I'd ask you to take a look at Exhibit 8.

18 A Okay.

19 Q It's an excerpt from Jennifer Virden's

20 Campaign Finance Report dated December 8th, 2020. This

21 is in connection with the runoff election for Council

22 District 10. Do you see that?

23 A Yeah. Another contribution.

24 Q Third page -- I mean the last page, third box

25 shows you contributed \$400 November 5th, 2020 to that

Page 55

1 campaign, right?

2 A Yes. That's what it says.

3 Q And that's correct, right?

4 A I assume it is.

5 (Exhibit No. 9 marked.)

6 Q I'd ask you to look at Exhibit 9, excerpt

7 from the Campaign Finance Report for Virden dated

8 January 4, 2021 [sic] submitted in connection with her

9 mayoral race in 2022. Do you see that?

10 A Yes.

11 Q Turn to the last page, second box.

12 A Yes.

13 Q It shows that on November 8, 2021 you

14 contributed \$400 to that campaign, is that correct, as

15 far as you recall?

16 A I believe that's right.

17 Q And you understand that you could have

18 contributed \$50 more to that campaign somewhere between

19 the time you first contributed and the end of the

20 campaign, right?

21 A Yeah. I think I -- did I do that? I don't

22 remember if I did or not.

23 Q You don't recall doing it, do you?

24 A It's only \$50, so I didn't think, I didn't

25 think it was going to help, but yeah, I mean, yeah, I

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14 (Pages 53 to 56)

1 guess that's it. Yeah.
 2 (Exhibit No. 10 marked.)
 3 Q I'd ask you to take a look at Exhibit 10.
 4 A Mm-hm.
 5 Q It's another Campaign Finance Report excerpt
 6 dated January 15, 2021 in connection with the runoff
 7 race for District 10 for Virden.
 8 A Uh-huh.
 9 Q You see that? Turn to the last page, which
 10 is the second page I think. Shows that on December 23,
 11 2020 the campaign paid you \$2,000. Do you see that?
 12 A Yeah. Okay.
 13 Q Is there any reason to question that?
 14 A I think that -- yeah. That sounds right. I
 15 mean, I didn't ask for it, but basically it was a
 16 compensation for all of my work I guess.
 17 Q What did you do as volunteer coordinator?
 18 A Everything. Basically -- I mean, I put that,
 19 I put it into my statement earlier.
 20 Q I just haven't had a chance to digest that
 21 yet, so --
 22 A Essentially --
 23 Q The way you described it in your
 24 interrogatories, which is Exhibit -- interrogatory
 25 responses, which is Exhibit 2, right? Whatever you

Page 57

1 said in those interrogatories?
 2 A Yes. Whatever I said in the interrogatories.
 3 Yeah.
 4 Q Okay. All right. Let's go back to
 5 Exhibit 4.
 6 A Yes.
 7 Q Turn to paragraph 27. Read that to yourself,
 8 and then I have a question.
 9 A Go ahead.
 10 Q So how are you involved in Austin politics
 11 today?
 12 A Today I -- we just had, we just had an
 13 election where, where my candidate Jennifer Virden lost
 14 in the election. So right now we don't have -- we have
 15 no -- there's no candidates, there's no other
 16 candidates right now. I mean, there's no election
 17 pending, but if there was, I would be supporting her
 18 again.
 19 Q And I asked how you're involved in Austin
 20 politics now.
 21 A As a, as a donor and then a participant in
 22 any campaign I believe in.
 23 Q And why are you still interested in Austin
 24 politics since you don't live here anymore?
 25 A Well, I knocked on, like, 4,000 doors back in

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1 2020, so I guess I kind of got a -- you know, I guess I
 2 can't let it go. I just, you know, I, I want what's
 3 right, and, you know, so maybe my -- maybe over time my
 4 interest will wane, but, you know, there's work,
 5 there's work to be done and there's -- I want to, like
 6 I say, I want all people, all parties to be
 7 represented. I want, you know -- what's good for
 8 Austin is good for Texas, and what's good for Texas is
 9 good for me.
 10 Q How big is Spring, Texas roughly?
 11 A The population?
 12 Q Population. Yeah.
 13 A I don't know. I would have to estimate a
 14 hundred thousand, maybe right -- maybe -- oh, that's
 15 probably about 200,000.
 16 Q Are you active in any way, contributions,
 17 volunteer work, whatever, just paying attention, in
 18 Spring County?
 19 A No.
 20 Q Spring, I'm sorry, Spring, Texas --
 21 A Montgomery County?
 22 Q -- politics?
 23 A No. Not really.
 24 Q What about Montgomery County?
 25 A No. Not really. I donate money though.

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1 Q You don't have money what?
 2 A I donated money to -- I can tell you who I
 3 donated to this last election.
 4 Q Why don't you do that.
 5 A Dan Crenshaw for the second congressional
 6 district in Texas. Who else. Oh, I also -- this is
 7 interesting. So this -- all right. I donated to a
 8 county judge for Harris County. Even though I don't
 9 live in Harris County, I donated to Alex, Alex Mealer
 10 for county -- for Harris County judge.
 11 Q He was a Republican nominee?
 12 A She.
 13 Q She.
 14 A She, she -- I always, I always -- I've only
 15 donated money to women candidates, I don't know why,
 16 but anyway, yeah. They're probably more reasonable
 17 than men, right?
 18 Q Yeah.
 19 A So anyway --
 20 Q I didn't know Mr. Crenshaw was a female,
 21 but --
 22 A No. Well, yeah, other than him. Yeah.
 23 Q Okay.
 24 A Nothing wrong with that, but anyway --
 25 Q Oh?

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15 (Pages 57 to 60)

1 A No. I mean, well, I mean her, Alex Mealer,
2 yeah.
3 Q Okay.
4 A Might get him more votes, who knows. But
5 anyway, yeah. So that's -- those are the two that I
6 can think of where I gave them some money. Who else.
7 Oh, Governor Greg Abbott, gave him money. So, yeah,
8 all the Republican candidates that I found relevant.
9 Q Well, then who else did you --
10 A Greg Abbott for governor, Dan Crenshaw from
11 the 2nd congressional district, Chris (indiscernible),
12 and Alex Mealer for Harris County judge. And then the
13 only other -- those, those are the only -- there may be
14 some other congressional candidates even outside of
15 Texas, but I don't -- I can't think of who they are
16 right now. I know, I know that in 2020 I gave to at
17 least 10, 8 or 10 candidates.
18 Q So when did you give your money to Dan
19 Crenshaw, how far before the election?
20 A Way -- I think, I mean, as soon as I knew
21 about it. So probably way back in the primary period,
22 early, or early on, because I was worried about the
23 far, far-right candidate. He had some opposition from
24 the far right, and so I was worried about that.
25 Q Okay.

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1 A So early on.
2 Q And what about the Republican candidate for
3 county judge in Harris County, what's the timing on
4 that contribution?
5 A Early on as well, very early on. As soon as,
6 as soon as I became aware of it.
7 Q In the primary then?
8 A I think -- yes. In the primary, definitely
9 in the primary. The big concern is, there's -- both
10 parties are controlled by extremists, okay? And the
11 far-right and the far-left people, they control
12 the -- essentially they control the primary. They're
13 the ones that turn out. People that are extreme turn
14 out, and that's what I'm worried about. So we have to
15 get the centrist candidates, people that are
16 reasonable. We need -- they need support. That's why
17 I was contributing in the primary process.
18 Q Do you -- have you been in touch with
19 Ms. Virden since the election?
20 A Yeah. Just via a text message or so here and
21 there. He's got all that, or should.
22 Q Okay. And --
23 A She's out of town -- yeah. I was going to
24 see her this week, today, but she's out of town.
25 Q Has she confided in you whether she plans to

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1 run again for Austin city office?
2 A No, she hasn't. We haven't discussed it yet.
3 Q If she does, do you plan to make a campaign
4 contribution to her?
5 A Probably.
6 Q Why do you say probably?
7 A I mean, I would say -- yeah. I would just
8 say yes. Let's just say yes.
9 Q Well, no. I mean, say what the truth is.
10 A Well, unless her views, unless her views
11 change fundamentally and she, and she becomes a
12 communist or she becomes, you know, either far -- you
13 know, if her views dev- deviate in what they are now,
14 either too far right or too far left, I won't support
15 her. But if her views are the same as they are now, I
16 will continue to support her, you know? This will
17 probably be her last chance, you know, her third time.
18 Three strikes, you're out, so...
19 Q Are you willing to give any campaign
20 contributions in case she has campaign debt she needs
21 to pay off?
22 A Yeah. Probably. I mean, I don't know. I'd
23 have to think about that, but possibly.
24 Q Do you, do you intend to make any
25 contribution to -- contributions, rather, to any

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1 candidates in Austin future elections, setting aside
2 Virden?
3 A Yeah.
4 Q Who?
5 A I don't know yet. We don't have any -- it
6 depends if we have -- if there's a candidate that I
7 agree with and that, and that -- you know, just
8 depends. I wouldn't rule it out, no, by any means.
9 Q So I --
10 A I give to candidates all over the place. I
11 give to candidates in New York, all over the country.
12 Q Okay. I, I may not have been paying enough
13 attention and may have missed what you said, but so I
14 want to clarify this. You said at one point that you
15 knocked on over 4,000 doors in Austin in 2020, right?
16 A Right.
17 Q That was in the Virden campaign, right?
18 A Correct.
19 Q Is that the only political volunteer work,
20 setting aside contributions, that you've ever done?
21 A Yes.
22 Q And for you what's the difference in terms of
23 for you as a contributor if you give money to a
24 campaign, what's the difference between doing that and
25 putting up a yard sign, knocking on doors in support of

Page 64

16 (Pages 61 to 64)

1 the candidate and such?

2 A It's a lot more work, a lot bigger

3 commitment.

4 Q Giving money?

5 A No. Actually doing work, knocking on doors,

6 making phone calls, whatever, volunteering. Either

7 volun- you know, working for the campaign is a lot more

8 work than giving money.

9 Q It's just easier.

10 A Sorry?

11 Q Giving money is easier and faster.

12 A It's easier if you have the money. Yeah.

13 MR. HICKS: Okay. I pass the

14 witness.

15 EXAMINATION

16 BY MR. NAJVAR:

17 Q Mr. Clark, let me just maybe follow up on a

18 few, a few quick things that were discussed earlier.

19 A Uh-huh. Do you want to leave (inaudible) --

20 oh.

21 Q So you mentioned earlier that -- well, let me

22 just ask you. When you found out Jennifer Virden was

23 running for office again in 2022 your declaration says

24 you would have given her \$400 but for the blackout

25 period back in March of 2021, right?

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1 A That's correct.

2 Q Why, why is it important to you to -- or why

3 did you desire to give the money that early before the

4 election day?

5 A So that, so that the campaign could get off

6 the ground. It's, it's viable to raise money early.

7 Q And what do you mean by getting off the

8 ground?

9 A Well, you have to have supporters, you have

10 to have people out there to support -- people out there

11 that support you, and, and you have to get an early

12 start. Just like running a race, if you get, if you

13 get a head start --

14 THE REPORTER: Excuse me. I'm

15 sorry. If you could answer a little bit more central

16 so I can hear you.

17 THE WITNESS: Okay. Yeah.

18 A So it's important to get a head start, and

19 you don't want to fall behind if some other candidate

20 is raising money -- if other candidates are raising

21 money and you don't have any, then you're, you're,

22 you're -- you fall behind, and you don't want to fall

23 behind.

24 Q And I know you said a moment ago that you're

25 not aware of any candidates to future Austin elections

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1 that have announced already that you're aware of,

2 right?

3 A Right. We just had an election, so I'm not

4 aware of any yet.

5 Q Right. But do you, do you continue to pay

6 attention to Austin politics?

7 A Yeah. I continue to pay attention to Austin

8 politics and politics across the country, yeah, and,

9 yeah, so it's conceivable that I could donate to

10 another Austin candidate or candidates anywhere,

11 wherever I see the need.

12 Q Well, and but I just want to, you know, make

13 sure I'm clear that that intent continues to apply with

14 respect to Austin politics.

15 A Yeah. It continues to apply. I still, I

16 still have intent to contribute to Austin candidates if

17 I believe in what they believe in, and I believe we'll

18 see. I'll leave it at that.

19 Q That may be all I have. Just let me take a

20 quick look at my notes here.

21 And maybe just one last question on

22 this, this statement where you added an "and" into the

23 declaration form earlier where you say you thought that

24 maybe it was a (crosstalk) --

25 A I think it -- I, I could be wrong.

Page 67

1 Q Yeah. Looks like --

2 A Looks like it to me. It looks to me like it

3 was a grammat- an error in the, in the way the document

4 was written, that it was a typo and they left out the

5 "and." I think that's what it is.

6 Q Well, let me just ask you. So you made clear

7 that you believe the campaign should, should be allowed

8 to start raising funds as early as they want. Is that

9 fair to say?

10 A That is correct. I believe the campaign

11 should be able to raise funds immediately.

12 Q And do you think, having worked in a

13 campaign, do you have any thoughts on -- well, what are

14 the -- can you identify or explain some of the purposes

15 that early, money raised early can be used for, whether

16 it's spent or whether it's just kept in a campaign?

17 A Right. So it's important, it's important for

18 a campaign to raise funds early and often, early

19 specifically so that we can, we can have a -- host

20 events, host events like, Let's meet at some restaurant

21 and have our supporters, you know, get together.

22 You've got, you've got to go to host events and host,

23 you know, and, and need to gain access to venues. And

24 you've got to spend money, you know, to do these

25 things, and that's how you get supporters. You have to

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1 spend money for your supporters to meet and talk and
 2 collaborate. Does that answer your question?
 3 Q It does. Thank you.
 4 MR. NAJVAR: And we'll reserve our
 5 questions for trial.
 6 FURTHER EXAMINATION
 7 BY MR. HICKS:
 8 Q I have a couple of follow-up questions. The
 9 Exhibit 6 that's your verification, you can, you can
 10 find it. You're welcome to dig it out. I have a
 11 broader question.
 12 A Okay. Go ahead.
 13 Q In that you don't consider this to be a
 14 pledge to make that contribution to her, did you?
 15 A No. I didn't consider it a pledge, but --
 16 Q That's all.
 17 A No.
 18 Q Okay. Then when did you first learn of the
 19 fundraising window that's reflected in Exhibit 3?
 20 A I first learned of the fundraising window
 21 limitations when I, when I was discussing with Brad and
 22 Jennifer her running for mayor.
 23 Q When was that?
 24 A Shortly -- I would say early in 2021, early
 25 in 2021, maybe a few months after we lost the city

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1 council runoff. Sometime in 2021. I don't know
 2 exactly when, but when I found out about it I'm, like,
 3 "What? That isn't right." So, "So what do we do?"
 4 "Well, we can file this lawsuit." So that's what we
 5 did.
 6 Q But you didn't know about the fundraising
 7 rule when Ms. Virden was running for the District 10
 8 seat in 2020, correct?
 9 A Well, because in that case --
 10 Q Wait, wait, that's not my question.
 11 A I wasn't aware -- it didn't -- it wasn't
 12 applicable there, because she didn't start running
 13 until August.
 14 Q And she did a good job fundraising, right, in
 15 that race?
 16 A Yeah. She out- she outraised her opponent.
 17 MR. HICKS: I have no further
 18 question.
 19 MR. NAJVAR: And before you --
 20 maybe we caveat that, because I sent you a link to the
 21 photos. I don't think -- you might want to look at
 22 those.
 23 MR. HICKS: Let's go off the record
 24 for just a second to see.
 25 (At 12:55 the proceedings went off

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1 the record, continuing at 1:00.)
 2 Q (By Mr. Hicks) Mr. Clark, I've looked
 3 through the text -- quickly through the text -- I
 4 mean the email texts that you had provided in this
 5 document production.
 6 A Yes, sir.
 7 Q Is Janet your wife?
 8 A Correct. Janet is my wife.
 9 Q Okay. And I note June 20th, 2022 -- well,
 10 June 20th Ms. Virden asked if you would hit your wife
 11 up for \$400, do you recall doing that, for a
 12 contribution?
 13 A Yeah. My wife wasn't in a good mood, so I
 14 didn't ask her.
 15 Q Okay. Do you -- was that in 2022?
 16 A Yeah. It was recently. Yeah.
 17 Q And then somewhere in here there's, there's a
 18 couple of texts about asking whether there'd be a brief
 19 endorsement video or statement done for her. Was that
 20 directed at asking you to do it?
 21 A Yeah, yeah. I offered to do that, and
 22 then -- but then they told -- Brad told me I didn't
 23 need to do it because they already had so many videos
 24 they didn't need any more.
 25 Q Do you recall when that happened?

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1 A Well, I'd say probably within a week or two
 2 after the, after the request that I was going to do it,
 3 and then they told me, "No, don't bother. We already
 4 have plenty of videos." So they didn't need it
 5 anymore.
 6 MR. HICKS: Okay. I have no
 7 further questions.
 8 MR. NAJVAR: And we looked -- just
 9 for the record, we discussed this. You know, your
 10 request for production of course pertains to all
 11 communications, but in his email I understand that he's
 12 got, like, the blast emails that Jennifer sent out in
 13 her campaign, but in terms of -- so if you want those,
 14 he can produce those --
 15 THE WITNESS: Yeah.
 16 MR. NAJVAR: -- but, like, if you
 17 wanted to --
 18 MR. HICKS: What you've already
 19 provided?
 20 THE REPORTER: We're still on?
 21 MR. NAJVAR: Yeah. I'm just asking
 22 if you -- in the interest of complete transparency
 23 or -- you know, if you already have those lists of the
 24 blast emails. I'm just saying your RFP technically
 25 asked for his communications with Jennifer Virden, and

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1 if those are responsive to your request, then he has
 2 those in his email also.

3 Q (By Mr. Hicks) Let's do it this way --

4 A I have those. I think there was one -- I
 5 think one of those blast emails I responded to, and I
 6 got back, like, a responsive thank you. So I mean, you
 7 can look at it, I can show you right now, but I mean,
 8 you can see what's there. But I'm just saying we want
 9 to be fully transparent.

10 Q No. I think I know how we can handle this.
 11 Let's look at Deposition Exhibit -- it's good we did
 12 this.

13 A You missed one.

14 Q Yeah.

15 (Exhibit No. 11 marked.)

16 Q I'll ask you it's to look at Deposition
 17 Exhibit 11. Let me tell you what it is. Basically
 18 it's Jennifer Virden's responses to first set of
 19 interrogatories to her. This is supplemental, excuse
 20 me, supplemental responses. Go back to --

21 A So these are Jennifer Virden --

22 Q Hold on a second. Go back to page 10.

23 A Okay.

24 Q I'm sorry. Page 4.

25 A I don't think I ever saw this before, so --

Page 73

1 Q This is to take care of this problem we have
 2 here. So look on page 4, see number 10 there that's in
 3 bold? This is directed to her, right here.

4 A Yeah. Okay.

5 Q Read that to yourself, and then I'll tell you
 6 my question.

7 A "Identify" --

8 Q Wait, you don't have to read it out. Okay.

9 A Okay.

10 Q Okay. So if you look at pages 4 through
 11 16 --

12 A Mm-hm.

13 Q -- you'll see, and you're welcome to look
 14 through it as closely as you want, you'll see that
 15 what's included there are Constant Contact emails that
 16 were sent out in connection with the campaign, Facebook
 17 postings in connection with the campaign, and tweets in
 18 connection with the campaign.

19 A Mm-hm.

20 Q Are the documents -- did you review those?

21 A No. I've never seen this before.

22 Q No. I don't mean that set of documents. I
 23 mean the communications that are her, basically her
 24 social media --

25 A Well, I re-tweeted a lot of her tweets trying

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1 to show support for the campaign, but that's it. I
 2 mean, and then some of the Facebook posts, but I don't
 3 read everything, you know.

4 Q You read some of them.

5 A Yeah. I'm sure I did some of them.

6 Q Okay. Any of -- and what about the Constant
 7 Contact emails?

8 A Yeah. I read some of those.

9 Q Okay. And so as I understand it, this set of
 10 documents that Mr. Najvar was talking about a few
 11 minutes ago that you have that I could look at in a
 12 sense of completeness are the same set of documents as
 13 this; is that correct?

14 A That is correct.

15 Q Okay. No more questions, and I don't need
 16 them.

17 A Well, I was trying to explain there's one,
 18 there was one email, one of those, those communications
 19 where I responded saying something, but I don't
 20 remember what I said, and then she responded to say
 21 thank you, or somebody did. That's all. But you're
 22 happy to look through my email to verify. I just want
 23 to make sure.

24 MR. NAJVAR: I doubt he wants to do
 25 that.

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1 THE WITNESS: I know.

2 Q (By Mr. Hicks) I would be uphappy to look
 3 through those.

4 A I'm just trying to, I'm just trying to be as,
 5 you know, as honest as I can, you know. That's the way
 6 I operate.

7 MR. HICKS: No further questions.

8 MR. NAJVAR: And we'll reserve our
 9 questions for trial.

10 (At 1:07 p.m. the proceedings
 11 adjourned.)

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1	CHANGES AND SIGNATURE			
2	WILLIAM CLARK			
3	November 28, 2022			
4				
5	PAGE	LINE	CHANGE	REASON
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Page 77

1	ACKNOWLEDGMENT OF DEPONENT	
2		
3	I, WILLIAM CLARK, do hereby certify that I have	
4	read the foregoing pages and that the same is a correct	
5	transcription of the answers given by me to the	
6	questions therein propounded, except for the	
7	corrections or changes in form or substance, if any,	
8	noted in the attached Changes and Signature Page	
9	(Errata).	
10		
11		
12		
13	WILLIAM CLARK	
14		
15	DATE	
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1	IN THE UNITED STATES DISTRICT COURT	
2	FOR THE WESTERN DISTRICT OF TEXAS	
3	AUSTIN DIVISION	
4	JENNIFER VIRDEN,	\$
5	Plaintiff,	\$
6	v.	\$ CIVIL ACTION NO.
7	THE CITY OF AUSTIN,	\$
8	Defendant.	\$
9	REPORTER'S CERTIFICATION OF THE	
10	ORAL DEPOSITION OF WILLIAM CLARK	
11	November 28, 2022	
12		
13	I, Sandra S. Givens, Certified Shorthand Reporter	
14	in and for the State of Texas, hereby certify to the	
15	following:	
16	That the witness, WILLIAM CLARK, was duly sworn by	
17	the officer and that the transcript of the oral	
18	deposition is a true record of the testimony given by	
19	the witness:	
20	That the original deposition transcript was	
21	submitted to WILLIAM CLARK;	
22	That a copy of this certificate was served on all	
23	parties and/or the witness shown herein on December 5,	
24	2022.	
25	I further certify that pursuant to FRCP Rule	

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1	30(f)(1) that the signature of the deponent was
2	requested and that the signature is to be returned
3	within 30 days from the date of receipt of the
4	transcript. If returned, the attached Changes and
5	Signature Page contains any changes and the reasons
6	therefor:
7	That \$432.30 is the deposition officer's charges
8	to the City of Austin for preparing the original
9	deposition transcript and any copies of exhibits;
10	That the amount of time used by each party at the
11	deposition is as follows:
12	Renea Hicks - 1 hour, 13 minutes
13	Jerad Najvar - 6 minutes
14	That pursuant to information given to the
15	deposition officer at the time said testimony was
16	taken, the following includes counsel for all parties
17	of record:
18	Renea Hicks - Attorney for Defendant
19	Jerad Najvar - Attorney for Plaintiff
20	I further certify that I am neither counsel for,
21	related to, nor employed by any of the parties or
22	attorneys in the action in which this proceeding was
23	taken, and further, that I am not financially or
24	otherwise interested in the outcome of the action.
25	

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20 (Pages 77 to 80)

1 Certified to by me this 5th day of December
2 2022.

3

4

GIVENS COURT REPORTING
6549 Fair Valley Trail
Austin, Texas 78749
(512) 301-7088

5

6

7

8

SANDRA S. GIVENS, CSR

Certification No. 5000

9

sg-1984

Certificate Expires 1/31/24

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